

CAROLINE L. FOWLER, City Attorney (SBN 110313)
JOHN J. FRITSCH, Assistant City Attorney (SBN 172182)
City of Santa Rosa
100 Santa Rosa Avenue, Room 8
Santa Rosa, California 95404

Telephone: (707) 543-3040
Facsimile: (707) 543-3055

Attorneys for Defendants
CITY OF SANTA ROSA; RICH CELLI, an individual and Officer of the
SANTA ROSA POLICE DEPARTMENT; TRAVIS MENKE,
an individual and Officer of the SANTA ROSA POLICE DEPARTMENT;
and PATRICIA MANN, an individual and Officer of the
SANTA ROSA POLICE DEPARTMENT

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

PATRICIA DESANTIS, et al.,

Case No. C 07-3386 JSW

Plaintiffs,

v.

CITY OF SANTA ROSA, et al.,

Defendants.

**STIPULATION AND ~~PROPOSED~~
ORDER PERMITTING AMENDMENT
TO PLAINTIFFS' BILL OF COSTS**

WHEREAS Plaintiffs Patricia DeSantis and Dani DeSantis filed a Bill of Costs on
October 5, 2012;

WHEREAS Plaintiffs claim, and defendants object to, costs "related to preparing charts,
diagrams, videotapes and other visual aids at trial..." (Par. 5c and Exhibit "F": Thinktwice Inc.
Invoice) and "videotaped deposition[s]" (Par. 6 and excerpts of Exhibit "G": various invoices
detailing videotaped deposition costs);

WHEREAS counsel for defendants and plaintiffs have met and conferred pursuant to
Local Rule 54-2, and agree to defer litigation of the dispute re costs as follows;

Subject to the approval of the court, the parties to the above-entitled action, and by their
respective counsel, stipulate that:

1. Plaintiffs shall file an amended Bill of Costs deleting costs claims "related to preparing

charts, diagrams, videotapes and other visual aids at trial..." (Par. 5c and Exhibit "F": Thinktwice Inc. Invoice) and "videotaped deposition[s]" (Par. 6 and excerpts of Exhibit "G": various invoices detailing videotaped deposition costs). The amended Bill of Costs shall be deemed timely filed.

2. Plaintiffs reserve, and this Stipulation is without prejudice to, the right to claim costs "related to preparing charts, diagrams, videotapes and other visual aids at trial..." (Par. 5c and Exhibit "F": Thinktwice Inc. Invoice) and "videotaped deposition[s]" (Par. 6 and excerpts of Exhibit "G": various invoices detailing videotaped deposition costs) pursuant to 42 U.S.C. §1988.
3. Defendants reserve, and this Stipulation is without prejudice to, the right to object to costs "related to preparing charts, diagrams, videotapes and other visual aids at trial..." (Par. 5c and Exhibit "F": Thinktwice Inc. Invoice) and "videotaped deposition[s]" (Par. 6 and excerpts of Exhibit "G": various invoices detailing videotaped deposition costs) pursuant to 42 U.S.C. §1988.

/s/

Dated: October 12, 2012

 Caroline L. Fowler
 City Attorney
 Attorney for Defendants
 CITY OF SANTA ROSA, Santa Rosa Police Officers
 RICH CELLI, TRAVIS MENKE, and PATRICIA
 MANN

LAW OFFICES OF AMITAI SCHWARTZ

/s/

Dated: October 12, 2012

 Amitai Schwartz
 Attorneys for Plaintiff
 PATRICIA DESANTIS

ORDER

Pursuant to the stipulation of the parties and for good cause shown, **IT IS SO**

ORDERED.

Dated: October 15, 2012


 HONORABLE JEFFREY S. WHITE
 United States District Judge